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Counsel for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

_____)	
MedWell LLC, a limited liability company)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 2:20-cv-10627-KM-ESK
CIGNA Corporation; CIGNA Health and)	
Life Insurance Company; CIGNA)	
Healthcare of New Jersey, Inc.;)	<i>Document Filed Electronically</i>
Connecticut General Life Insurance)	
Company; John Does and Jane Does 1-20;)	DECLARATION OF STEVEN L.
and XYZ Corporations and ABC)	PENARO IN SUPPORT OF <i>PRO HAC</i>
Partnerships 1-20,)	VICE APPLICATION
)	
Defendants.)	
_____)	

I, STEVEN L. PENARO, ESQ., hereby declare:

1. I am an attorney with the firm of Alston & Bird LLP, in New York, NY. I am a member in good standing of the New Jersey Bar, having been admitted in 2009, and am also a member in good standing of the United States District Court for the District of New Jersey. Our firm represents Defendants Cigna Corporation, Cigna Health and Life Insurance Company, Cigna Healthcare of New Jersey, Inc., and Connecticut General Life Insurance Company (together, "Cigna" or "Defendants"), in the above-captioned matter. I am making this declaration in support of the *pro hac vice* admission of Edward T. Kang, Esq.

2. I agree, pursuant to L. Civ. R. 101.1(c)(2), to make payments to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a) and pay annual fees as provided by New Jersey Court Rule 1:20-1(b) on behalf of Counsel.
3. As set forth in his Declaration, Mr. Kang practices in the District of Columbia and in the State of New York.
4. Cigna has requested that Mr. Kang be admitted *pro hac vice* in order to represent it in this matter.
5. During a telephonic conference on September 14, 2020, Vafa Sarmasti, counsel for Plaintiff MedWell LLC, consented to the *pro hac vice* admission of Mr. Kang.
6. The proposed Order submitted herewith sets forth that all pleadings, briefs and papers filed with the Court will be signed by our law firm as attorneys of record, and we will be responsible for the conduct of this action and of counsel as set forth in L. Civ. R. 101.1(c).
7. For the foregoing reasons, we respectfully request that the Court enter the proposed Order to admit *pro hac vice* Edward T. Kang, Esq.
8. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 2, 2020

/s/ Steven L. Penaro

Steven L. Penaro, Esq.